

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOSEPH BRUNNER,

Defendant.

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CASE NO.

1:20CR-122

JUDGE

J. BARRETT

INDICTMENT

18 U.S.C. § 2261A(2)

THE GRAND JURY CHARGES:

GENERAL ALLEGATIONS

1. At all times material to the Indictment, Defendant JOSEPH BRUNNER ("BRUNNER") has been a resident of the Southern District of Ohio.
2. BRUNNER was formerly an employee of a hospital in the Southern District of Ohio (the "Hospital") but his employment was terminated by the Hospital in 2017.
3. At all times material to the Indictment, BRUNNER operated two different accounts on Facebook. Facebook is an interactive computer service, electronic communication service, electronic communication system of interstate commerce, or facility of interstate or foreign commerce.
4. Beginning in 2017 and continuing to the present, BRUNNER has made public statements on his two different Facebook accounts that targeted the Hospital, and specific individuals that worked for the Hospital, including individuals identified herein as Victims 1-4 (collectively referred to as the "Victims").
5. BRUNNER's public statements on his Facebook accounts towards and about these individuals were intended to harass, intimidate, and cause substantial emotional distress to the Victims, as well as their family members.
6. In general, BRUNNER made multiple public statements on his Facebook accounts to

the extent that:

- a. The Hospital is antagonistic towards Muslims, and that Victims 1-4 were involved in “covering up” the harassment of a Muslim person;
- b. BRUNNER is waging a jihad against the Hospital, seeking payback against the Hospital; and
- c. BRUNNER is associated with and has contacted violent or radical individuals as part of his “jihad.”

7. On BRUNNER’s “Joe Brunner” Facebook account, BRUNNER made the following public statements:

- a. On or about March 16, 2018, BRUNNER wrote: “And we all know what happens when Islam is disrespected. I’m going to tell my Muslim friends, and let them deal with [the Hospital].”
- b. On or about June 3, 2018, BRUNNER wrote: “Some f my Muslim friends, know most of the story, and want names. But I’ve not yet given the names out. Im going to post to all my social media accounts, soon. About 7,000 followers in 13 countries. [The Hospital’s] reputation is going to be destroyed. . . So I’m going to completely ruin [the Hospital’s] reputation. And destroy everyone involved.”
- c. On or about August 24, 2018, BRUNNER wrote to his “friends in the Tri State area” that he is trying to find out where Victim #3 currently works.
- d. On or about August 31, 2018, BRUNNER wrote regarding the Hospital: “Beware of people patient or visitors wearing full burkas. I told my Muslim friends in other countries the story of [name] tell me Muslims were “dirty.” , , They are very pissed off. . . They have names, addresses, photos, satellite images. Everything. They praise when a Palestinian kills an Isreali. Their Facebook has been deleted several times by Facebook for hate. These are the

extreme hardline Islamic. I have no way of contacting them if I could.”

- e. On or about October 11, 2018, regarding his purported allies in this “jihad,” BRUNNER further stated: “I think they are already watching them. Probably watching [Victim #1] too through his huge plate glass office window, from the parking lot. . . Jihad time now. . . I’m going to call my people in Pakistan and Indonesia tonight, when I’m on an encryption phone.”

8. On BRUNNER’s “Imam Karma” Facebook account (later referred to “Imam Mambo”), BRUNNER made the following public statements:

- a. BRUNNER stated that he has a “doctorate in surgical precision (IED)” with a concentration in jihad, IED’s, and “eliminating infidels.”
- b. On or about July 2, 2018, BRUNNER wrote that Victim #1 and Victim #3 were involved in “covering up” an incident with a Muslim employee and posted phone numbers for both individuals. BRUNNER posted: “They have disrespected and insulted Islam, and Prophet Mohammed.”
- c. On October 10, 2018, BRUNNER posted a complaint about waiting for medication and wrote: “Congratulations [Hospital]... you now have a jihad declared against you. 7,000 friends and followers in 13 countries, has its privileges. Every one involved now has many pissed off muslim boyfriends. That’s what happens when you insult Islam and the Prophet Mohammed.”
- d. On or about November 17, 2019, BRUNNER reposted allegations towards Victim #1 and #4 and wrote the Hospital “has insulted Islam. That has already been published on internet, and many muslims in Minnesota, and Michigan (and around the world) have already been informed, and are there in the hospitals.”
- e. BRUNNER reposted similar statements on November 18, 2018. He wrote regarding Victims #1-4: “Names and addresses of those who covered it up will

be posted soon, not on public view.” BRUNNER also wrote that Victim #2 and spouse “live within 10 miles of the Islamic center of greater Cincinnati I’ve already talked to the Council on American and Islamic Relations about it.”

- f. On or about December 22, 2019, BRUNNER posted a picture of people holding a banner which reads "Behead those who insult Islam." Underneath the photograph, BRUNNER posted several comments about the Hospital and identified the school district for the children of Victim #2. Brunner further wrote: “Their home addresses have been posted online in Pakistan. May Allah show No mercy to them or their family. Allah Akbar!!”
 - g. In February 2020, BRUNNER wrote: “Admins in Indonesia: ENGAGE!” He then posted: “Pakistan Admins...ENGAGE!” He then wrote: “Jihadi boots on the ground.”
 - h. On or about February 23, 2020, BRUNNER repeated the allegations about Victims #1-4 and an alleged incident with a Muslim employee. BRUNNER wrote that he published Victims #1-4’s home addresses, along with satellite images of their homes, to the dark web. He further stated: “They insulted Islam. . . It’s time for them to be held accountable for insulting Islam.”
 - i. On or about March 1, 2020, BRUNNER wrote that Victim #3 was the “top person who covered it” and posted the home address of Victim #3.
9. On or about August 15, 2020, BRUNNER made a public statement on Facebook that included the name of Victim #4’s daughter. BRUNNER noted that the daughter works for a specific day care company in a specific city in Tennessee. He then wrote, “We are asking our Muslim friends, in the USA, to contact your local mosque, for advice, to get the information to the contact the [school], to get her fired. Parents at the school would not want their children in an unsafe environment, when the family has a fatwa against them.”

10. BRUNNER has also sent emails and left voice messages consistent with the Facebook posts described above.

COUNT ONE
(Cyberstalking)

11. Paragraphs 1-10 are incorporated as if fully restated herein.

12. From about July 2017, until approximately September 2020, in the Southern District of Ohio, and elsewhere, Defendant JOSEPH BRUNNER, with the intent to harass and intimidate Victim #1 (or family members), used an interactive computer service, electronic communication service, electronic communication system of interstate commerce, and facilities of interstate or foreign commerce, including electronic mail and internet websites, to engage in a course of conduct that caused, attempted to cause, or would be reasonably expected to cause substantial emotional distress to the Victim #1 (or family members).

All in violation of Title 18, United States Code, Section 2261A(2).

COUNT TWO
(Cyberstalking)

13. Paragraphs 1-10 are incorporated as if fully restated herein.

14. From about July 2017, until approximately September 2020, in the Southern District of Ohio, and elsewhere, Defendant JOSEPH BRUNNER, with the intent to harass and intimidate Victim #2 (or family members), used an interactive computer service, electronic communication service, electronic communication system of interstate commerce, and facilities of interstate or foreign commerce, including electronic mail and internet websites, to engage in a course of conduct that caused, attempted to cause, or would be reasonably expected to cause substantial emotional distress to the Victim #2 (or family members).

All in violation of Title 18, United States Code, Section 2261A(2).

COUNT THREE
(Cyberstalking)

15. Paragraphs 1-10 are incorporated as if fully restated herein.

16. From about July 2017, until approximately September 2020, in the Southern District of Ohio, and elsewhere, Defendant JOSEPH BRUNNER, with the intent to harass and intimidate Victim #3 (or family members), used an interactive computer service, electronic communication service, electronic communication system of interstate commerce, and facilities of interstate or foreign commerce, including electronic mail and internet websites, to engage in a course of conduct that caused, attempted to cause, or would be reasonably expected to cause substantial emotional distress to the Victim #3 (or family members).

All in violation of Title 18, United States Code, Section 2261A(2).

COUNT FOUR
(Cyberstalking)

17. Paragraphs 1-10 are incorporated as if fully restated herein.

18. From about July 2017, until approximately September 2020, in the Southern District of Ohio, and elsewhere, Defendant JOSEPH BRUNNER, with the intent to harass and intimidate Victim #4 (or family members), used an interactive computer service, electronic communication service, electronic communication system of interstate commerce, and facilities of interstate or foreign commerce, including electronic mail and internet websites, to engage in a course of conduct that caused, attempted to cause, or would be reasonably expected to cause substantial emotional distress to the Victim #4 (or family members).

All in violation of Title 18, United States Code, Section 2261A(2).

A TRUE BILL.



GRAND JURY FOREPERSON

DAVID M. DEVILLERS
UNITED STATES ATTORNEY

A handwritten signature in black ink, appearing to read "Tim S. Mangan", is written over a horizontal line.

TIMOTHY S. MANGAN
ASSISTANT UNITED STATES ATTORNEY